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March 23, 2023

The Honorable Margo K. Brodie
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

By United States Priority Mail and ECF (letter only)

Re: United States v. Steven Nerayoff--Crim. No. 20-008 (MKB)

Dear Judge Brodie:

Accompanying this letter is a courtesy copy of my March 21, 2023 reply declaration (ECF 113) in support of Mr. Nerayoff's February 13, 2023 motion and unredacted copies of Exhibits 58 through 63. The unredacted versions of documents that were filed in ECF are labelled "unredacted ECF Doc ____."

As the unredacted versions of the exhibits would reveal the identities of the alleged victims, "John Doe," "Jane Doe" and "Company 1," I am requesting that the Court order the unredacted documents contained in the bound hardcopy sealed until further order of this Court.

I have also provided an updated exhibit list which provides the ECF document numbers for the exhibits submitted in support of Mr. Nerayoff's motion.

Respectfully submitted,
Michael A. Scotto

cc: Counsel for the Government via ECF (letter only)

United States v. Steven Nerayoff Case 1:20cr-00008-MKB

Exhibit # referenced in Declaration in support	ECF Document #
Exhibit 1 Properties Tab Company 1	105-2
Exhibit 2 email thread	105-3
Exhibit 3 infinite machine excerpt	105-4
Exhibit 4 Complaint	105-5
Exhibit 5 SKYPE Meeting Video 7 19 2017	Not filed in ECF. Video file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 6 Transcript of 7-19-2017 meeting	105-6
Exhibit 7 SKYPE Meeting Video 9-10-2017	Not filed in ECF. Video file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 8 Transcript of 9-10-2017 meeting	105-7
Exhibit 9 Company 1 016983	105-8
Exhibit 10 Messages between Jane Doe and Mr. Nerayoff	105-9
Exhibit 11 Company 1 document 014702	105-10
Exhibit 12 Company 1 Blog Post	105-11
Exhibit 13 Blog Post re: token allocation with pie chart	105-12
Exhibit 14 Company 1 014708	105-13
Exhibit 15 Telegram message from John Doe to Mr. Nerayoff	105-14
Exhibit 16 Jane Doe Skype Meeting invitation Company 1 028401 invite	105-15
Exhibit 17 SKYPE Meeting Video 11 6 2017	Not filed in ECF. Video file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 18 transcript of 11 6 2017 meeting	105-16
Exhibit 19 Company 1 014709	105-17
Exhibit 20 Jane Doe's two pages of screenshots (Company 1 014710 and 014711)	105-18
(there is no Exhibit 21)	(there is no exhibit 21)
Exhibit 22 11 7 2017 Service Payment Agreement	105-19
Exhibit 23 Spreadsheet of Company 1 token holders Company 1 034021	105-20
Exhibit 24 Company 1 Blog Loyalty Program	105-21
Exhibit 25 12 4 2017 Jane Doe text exchange with Mr. Nerayoff	105-22
Exhibit 26 12 5 2017 John Doe text exchange with Mr. Nerayoff	105-23
Exhibit 27 Company 1 036090 John Doe and Jane Doe get Alchemist emails	105-24

Exhibit 28 Company 1 001843 John Doe invited to daily Alchemist meetings	105-25
Exhibit 29 Rep. Davidson thank you to Mr. Nerayoff	105-26
Exhibit 30 Messaging between Mr. Nerayoff and John Doe	105-27
Exhibit 31 Washington State enforcement Action against Company 1	105-28
Exhibit 32 12-31-2017 Company 1 spreadsheet showing a liability to Mr. Nerayoff	105-29
Exhibit 33 4 30 2018 Company 1 spreadsheet showing liability moved to retained earnings	105-30
Exhibit 34 Nerayoff text sent to Jane Doe	105-31
Exhibit 35 Nerayoff email to Jane Doe and John Doe	105-32
Exhibit 36 Company 1 013652	105-33
Exhibit 37 Company 1 036138	105-34
Exhibit 38 2018-05-18 Hotel Room recording	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 39: 2018-05-18 Hotel room transcript	105-35
Exhibit 40 June 21, 2018 recording ¹ (DOJ-5927): Jane Doe and Michael Hlady	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 41 transcript of exhibit 40	105-36
Exhibit 42 June 21, 2018 recording (DOJ-5929): Jane Doe and Michael Hlady	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 43 transcript of exhibit 42	105-37
Exhibit 44 June 22, 2018 recording (DOJ 5930): Jane Doe and Michael Hlady	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 45 transcript of exhibit 44	105-38
Exhibit 46 November 19, 2018 recording (DOJ 00028): Jane Doe and Steven Nerayoff	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 47 transcript of Exhibit 46	105-39
Exhibit 48 November 21, 2018 recording (DOJ 5932): Jane Doe and Michael Hlady	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 49 transcript of exhibit 48	105-40
Exhibit 50 November 21, 2018 recording (DOJ 5934): Jane Doe and Michael Hlady	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 51 transcript of exhibit 50	105-41

¹ This recording was incorrectly identified in the declaration as occurring on June 21, 2019.

Exhibit 52 November 21, 2018 recording (DOJ 5935): Jane Doe and Michael Hlady	Not filed in ECF. Audio file provided on flash drive that is subject to a request to seal (document # 106)
Exhibit 53 transcript of Exhibit 52	105-42
Exhibit 54 2018-5-10 Nerayoff email in full	105-43
Exhibit 55 Indictment	105-44
Exhibit 56 7 18 2022 Agnifilo request	105-45
Exhibit 57 1 23 2023 Rule 16 request	105-46
Exhibit 58 Company 1_018071	113-1
Exhibit 59 Company 1_037496	113-2
Exhibit 60 Company 1_013902	113-3
Exhibit 61 Company 1_013303	113-4
Exhibit 61 Company 1_024957	113-5
Exhibit 62 Company 1_024958	113-6
Exhibit 63 Company 1_024959	113-7